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6 Attorneys for Defendant  
 7 AMAZON.COM SERVICES LLC

8 **UNITED STATES DISTRICT COURT**  
 9 **DISTRICT OF NEVADA**

10 ESTEFANIA CORREA RESTREPO,

11 Plaintiff,

12 v.

13 AMAZON.COM SERVICES LLC; DOES I-X,

14 Defendant.

Case No. 2:25-cv-00119-RFB-DJA

**STIPULATED DISCOVERY PLAN AND  
 SCHEDULING ORDER**

**(SUBMITTED IN COMPLIANCE WITH  
 LR 26-1(b))**

15 Defendant, Amazon.com Services LLC (hereinafter “Amazon”), and Plaintiff, Estefania  
 16 Correa Restrepo (“Restrepo”), by and through their respective attorneys of record, hereby submit  
 17 this Stipulated Discovery Plan and Scheduling Order pursuant to Federal Rule of Civil Procedure  
 18 26(f) and Local Rule 26-1(b).

19 **1. Fed. R. Civ. P. 26(a) Initial Disclosures:**

20 Pursuant to Federal Rule of Civil Procedure 26(f) and Local Rule of Court 26-1(a), on  
 21 February 24, 2025, counsel for Plaintiff, Ruthann Devereaux-Gonzalez, Esq., and counsel for  
 22 Defendant, Z. Kathryn Branson, Esq. of Littler Mendelson, conducted a meeting to discuss the  
 23 relevant issues for discovery, possible early resolution of the matter, and other pertinent issues.  
 24 Pursuant to these discussions, the parties agree that they will submit their initial disclosures on or  
 25 before **March 17, 2025**.

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1                   **2.      Discovery Cut-Off Date:**

2                   The parties request a discovery period of 180 days from January 24, 2025, the date the  
 3 Defendant Amazon filed its Answer. Accordingly, all discovery must be completed no later than  
 4 **Wednesday, July 23, 2025.**

5                   **3.      Amending the Pleadings and Adding Parties:**

6                   The date for filing motions to amend the pleadings or to add parties shall not be later than  
 7 ninety (90) days prior to the discovery cut-off date and, therefore, not later than **Thursday, April**  
 8 **24, 2025.**

9                   **4.      Fed. R. Civ. P. 26(a)(2) Disclosures (Experts):**

10                  In accordance with Rule 26(a)(2), initial disclosures identifying experts shall be made sixty  
 11 (60) days prior to the discovery cut-off date, and therefore, not later than **Tuesday, May 27, 2025,**  
 12 *[Deadline lands on a Saturday and Monday is a holiday, moved to Tuesday]* and disclosures  
 13 identifying rebuttal experts shall be made thirty (30) days after the initial disclosure of experts and,  
 14 therefore, not later than **Thursday, June 26, 2025.**

15                  **5.      Dispositive Motions:**

16                  The parties shall file dispositive motions not more than (30) days after the discovery cut-  
 17 off date and, therefore, not later than **Friday, August 22, 2025.**

18                  **6.      Pretrial Order:**

19                  If no dispositive motions are filed, and unless otherwise ordered by this Court, the Joint  
 20 Pretrial Order shall be filed not more than thirty (30) days after the date set for filing dispositive  
 21 motions and, therefore, not later than **Monday, September 22, 2025** *[Deadline lands on a Sunday,*  
 22 *moved to Monday].*

23                  **7.      Fed. R. Civ. P. 26(a)(3) Disclosures:**

24                  If no dispositive motions are filed, and unless otherwise ordered by this Court, the parties  
 25 shall file the disclosures required by Fed. R. Civ. P. 26(a)(3) and any objections thereto with the  
 26 Pretrial Order pursuant to LR 26-1(b)(6) in the Joint Pretrial Order, not more than thirty (30) days  
 27 after the date set for filing dispositive motions and, therefore, not later than **Monday, September**  
 28 **22, 2025** *[Deadline lands on a Sunday, moved to Monday].*

1                   **8. Alternative Dispute Resolution:**

2                   The parties certify they have met and conferred about the possibility of using alternative  
3 dispute-resolution processes including mediation, arbitration and early neutral evaluation. This  
4 case is currently set for an Early Neutral Evaluation session before Magistrate Judge Elayna  
5 Youchah, to take place on April 24, 2025 and the parties are prepared to attend and negotiate in  
6 good faith.

7                   **9. Alternative Forms of Case Disposition:**

8                   The parties certify they have considered consent to trial by a magistrate judge under 28  
9 U.S.C. § 636(c) and Fed.R.Civ.P.73 and the use of the Short Trial Program (General Order 2013-  
10 01).

11                   **10. Electronic Evidence:**

12                   The parties certify they have discussed whether they intend to present evidence in electronic  
13 format to jurors for the purposes of jury deliberations. Discussions between the parties will be  
14 ongoing as the trial date approaches and they stipulate that they intend to present any electronic  
15 evidence in a format compatible with the court's electronic jury evidence display system.

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1                   **11. Extensions or Modifications of the Discovery Plan and Scheduling Order:**

2                   In accordance with Local Rule 26-3, a stipulation or motion for modification or extension  
3 of this discovery plan and scheduling order must be made no later than twenty (21) days before the  
4 expiration of the subject deadline.

5                   Dated: February 24, 2025

6                   Respectfully submitted,

7                   */s/ RuthAnn Devereaux-Gonzalez*

8                   JAMES P. KEMP, ESQ.  
9                   KEMP & KEMP, ATTORNEYS AT LAW

10                  LEON GREENBERG, ESQ.  
11                  RUTHANN DEVEREAUX-GONZALEZ,  
12                  ESQ.  
13                  LEON GREENBERG PROFESSIONAL  
14                  CORPORATION

15                  Attorneys for Plaintiff  
16                  ESTEFANIA CORREA RESTREPO

17                  Dated: February 26, 2025

18                  Respectfully submitted,

19                  *Z. Kathryn Branson*

20                  Z. KATHRYN BRANSON, ESQ.  
21                  LITTLER MENDELSON, P.C.

22                  Attorneys for Defendant  
23                  AMAZON.COM SERVICES LLC

24                  **IT IS SO ORDERED.**

25                  Dated: February 28, 2025.

26                  *DAN J. ALBREGTS*  
27                  DANIEL J. ALBREGTS  
28                  UNITED STATES MAGISTRATE JUDGE

4905-6088-1438.3